

Message

From: Keller, Lynn [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=08038B86D66A47D3AACA8BEE1A63A5A7-LKELLER]
Sent: 7/6/2018 7:53:54 PM
To: MacDonald, Alex@Waterboards [Alex.MacDonald@waterboards.ca.gov]
Subject: RE: AR A40 ARAR Table - question on one entry
Attachments: Area 40 FS ARARs EPA edits 6July2018.xlsx

Ok, great—we'll nix this ARAR then.

I'm meeting with Larry to finalize the table at 3. I had to add the EPA VI Guidance in there again; it somehow was dropped out. Here's the latest version I edited that we're going to discuss at 3 (items still in red font are most recent changes, and I have yet to delete row 18):

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75 Hawthorne St, SFD-7-1
San Francisco, CA 94105

From: MacDonald, Alex@Waterboards [mailto:Alex.MacDonald@waterboards.ca.gov]
Sent: Friday, July 6, 2018 12:50 PM
To: Keller, Lynn <Keller.Lynn@epa.gov>
Subject: RE: AR A40 ARAR Table - question on one entry

I believe you are correct. There may be a non-hazardous waste treatment unit (perchlorate soils), but this does not apply to those facilities. They have their own set of requirements.

And – it would be OU-10 for this set of ARARs if it were to stay in. This got carried over from OU^ table.

Alex

From: Keller, Lynn [mailto:Keller.Lynn@epa.gov]
Sent: Friday, July 06, 2018 11:59 AM
To: MacDonald, Alex@Waterboards <Alex.MacDonald@waterboards.ca.gov>
Subject: AR A40 ARAR Table - question on one entry

Alex, it seems that this line isn't needed since we are not constructing a RCRA treatment facility at A40. I suspect you wanted this in here for a reason though. Larry says he's ok with deleting it—just double checking with you.

Even if we keep it (per your request), OU6 needs to be changed to OU10 (I think that was a remnant of an old table from the OU6 ROD).

| Authority | Medium | | | State Requirement | Federal Requirement | Status | Synopsis of Requirements | Action to be Taken to Attain Requirements |
|-------------------------|--------|--------|-----|-------------------|---------------------|--------|--------------------------|-------------------------------------------|
| | Soil | GW/S W | Air | | | | | |
| Location-Specific ARARs | | | | | | | | |

| | | | | | | | | |
|---------|---|---|--|----------------------------|---------------------------------|------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Federal | x | x | | 22 CCR Section 66264.18(b) | 40 CFR Section 264.18(b) (2010) | Applicable | A RCRA facility located in a 100-year flood plain must be designated, constructed, operated, and maintained to prevent washout of any hazardous waste by a 100-year flood. | Because any new treatment facilities in OU-10 may generate hazardous waste, any such facility constructed within a 100-year flood plain must comply with this requirement. |
|---------|---|---|--|----------------------------|---------------------------------|------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------|

- Row 18 has the following listed under Action to be Taken to Attain Requirements: "Because any new treatment facilities in OU-6 may generate hazardous waste, any such facility constructed within a 100-year flood plain must comply with this requirement." We have no plans to construct any sort of new treatment facility in OU-6, so is this really applicable? Also, if this needs to be included, I think OU-6 is a typo and should be OU-10.

I am OK with deleting the comment about the 100-year floodplain if we have no plans for a treatment facility.

Thanks, Alex,
Lynn

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